

**LIPSIUS - BENHAIM
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September 2, 2011

VIA ECF

Honorable Robert M. Levy
United States Magistrate Judge
United States District Court Freund
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Mark Kraft, Trustee v. Lincoln Benefit Life Company
Docket No. 10-2018 (JG) (RML)

Dear Judge Levy:

By consent of all parties, the parties are requesting an extension until November 15, 2011 to complete fact discovery.

Request for Extension of Time to Complete Fact Discovery

- (1) Date for Completion of Fact Discovery: September 30, 2011
- (2) Additional Time Needed: November 15, 2011
- (3) Number of Previous Requests for Extension: Request made on January 14, 2011
when third party was brought into case. All other extension of time were made by
court minute order.
- (4) Previous Request Granted: Yes
- (5) Consent: Yes, Defendant consents to extension of time
- (6) The extension will affect other scheduled dates. A copy of a proposed revised
discovery order is attached.

Reason for Request:

There was a discovery dispute as to document production and Interrogatory responses. The parties have been meeting and conferring throughout the summer in an effort to resolve the issues without court intervention. Although the parties have not completely resolved these

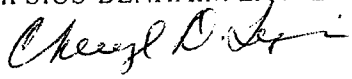
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Honorable Robert M. Levy
September 2, 2011
Page 2

issues, the parties have agreed to go forward with depositions and address certain open discovery issues following depositions. Defendant has agreed to produce additional documents that have not yet been received.

Very truly yours,

LIPSIUS-BENHAIM LAW LLP


Cheryl D. Lipsius

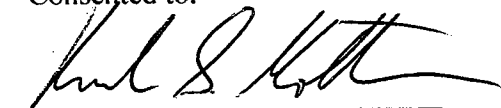
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Enclosure

Consented to:

SEYFARTH SHAW LLP

By: 
Richard Resnik, Esq.

Consented to:


Baruch S. Gottesman, Esq.

MARK KRAFT v. LINCOLN BENEFIT v. CHAIM MUSKAT
Docket No. 10-02018

PROPOSED REVISED SCHEDULING ORDER

Fact Discovery Due	November 5, 2011
End Date for Plaintiff's Witness Expert Reports	December 1, 2011
Amended Pleadings Due by Plaintiff	December 28, 2011
End Date for Defendants Witness Expert Reports	January 1, 2012
End Date for Expert Discovery	January 12, 2012
Dates for Filing Contemplated Dispositive Motion:	
Plaintiff	January 15, 2012
Defendant	January 15, 2012
Amended Pleadings Due by Defendant	February 11, 2012